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June 1, 2020

Via CM/ECF and E-mail

The Honorable Sean H. Lane  
United States Bankruptcy Court  
Southern District of New York  
One Bowling Green  
Courtroom: 701  
New York, NY 10004-1408

**Re: BSG Resources Limited (in administration); Case No.: 19-11845 (SHL)**

Dear Judge Lane:

On May 15, 2020, William Callewaert and Malcolm Cohen, in their capacity as Joint Administrators and Foreign Representatives (together, the “Joint Administrators”) for the debtor BSG Resources Limited (in administration) (“BSGR”) filed a *Motion for an Order (I) Affirming Confidentiality Designations and (II) Modifying the Court’s Confidentiality Stipulation* [Docket No. 94] (the “Motion”). Vale S.A. (“Vale”) filed its opposition to the Motion on May 26, 2020 [Docket No. 97] (the “Vale Opposition”), and on May 29, 2020, the Joint Administrators filed their reply [Docket No. 100] (the “Reply”).

The Motion concerns confidentiality designations to 73 documents. The documents are currently subject to a protective order [Docket No. 39] that requires the documents to be submitted to the Court under seal. *See, e.g., Motion of the Joint Administrators for Leave to File Under Seal Their Appendix of Confidential Documents* [Docket No. 95]. The Court held a status conference on the Motion on May 26, 2020. During that conference, the Court observed that the confidential documents are voluminous and invited the parties to submit a selection of sample documents for the Court to consider.

In their Reply, the Joint Administrators identified the following confidential documents for the Court’s consideration as examples supporting the relief requested in the Motion:

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(i) JA0014831; (ii) JA0005811; (iii) JA0056289; (iv) JA0056847; (v) JA0010140; (vi) JA0026135; (vii) JA0013041; and (viii) JA0020409.

Vale has requested that the Court also consider the following confidential documents in connection with the Vale Opposition:

(ix) JA0056284; (x) JA0056958; (xi) JA0010142; (xii) JA0010211; (xiii) JA0097155; (xiv) JA0102731; (xv) JA0010210; and (xvi) JA0045500.<sup>1</sup>

Subject to Your Honor's instruction, the Joint Administrators will provide copies of these documents to chambers.

Finally, in accordance with the Court's instruction at the May 26 status conference, the parties respectfully request that the Court set a hearing on the Motion at its earliest convenience. In consultation with counsel for Vale, and for the convenience of the Court, the parties are available at the following times this week:

***Tuesday, June 2, 2020:*** 12:00 p.m. to 3 p.m.;

***Wednesday, June 3, 2020:*** 10:00 a.m. 3 p.m.; and

***Friday, June 5, 2020:*** 9:00 a.m. to 2:00 p.m.

As always, the Joint Administrators are available at the call of the Court should Your Honor have any questions or require additional information.

Very truly yours,

/s/ Frederick D. Hyman

Frederick D. (Rick) Hyman

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<sup>1</sup> JA0045500 is not included in the list of documents identified in Schedule A to the Motion as currently subject to a confidentiality designation challenge. However, this document is referenced by the parties in their briefing concerning a category-type basis for designation of documents as confidential.